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Susan Halevy
9
10

11 **UNITED STATES BANKRUPTCY COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

13 In re:

14 SEATON INVESTMENTS, LLC, *et al.*,

15 Debtors and Debtors in
16 Possession.
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Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ
and 2:24-bk-12076-VZ

Chapter 11

**STIPULATION TO FURTHER
CONTINUE HEARING ON MOTION
TO AUTHORIZE USE OF CASH
COLLATERAL PURSUANT TO 11
U.S.C. § 363(C)(2)**

Date: August 27, 2024
Time: 11:00 a.m.
Crtrm.: 1368

- ☐ Affects All Debtors.
☐ Affects Seaton Investments, LLC
☐ Affects Colyton Investments, LLC
☐ Affects Broadway Avenue Investments, LLC
☒ Affects SLA Investments, LLC
☒ Affects Negev Investments, LLC
☒ Affects Alan Gomperts
☐ Affects Daniel Halevy
☒ Affects Susan Halevy

SLA Investments, LLC ("SLA"), Negev Investments, LLC ("Negev"), Susan Halevy ("Susan" or "Susan Halevy"), and Alan Gomperts ("Alan" or "Alan Gomperts"), debtors and debtors-in-possession (the "Debtors"), Archway Real Estate Income Fund I REIT, LLC, fka Archway Real Estate Income Fund I SPE I, LLC ("Archway"), Wells Fargo Bank National West ("Wells Fargo") as to the 2220 Bagley Ave and 3538 Greenfield Properties, and Harvest Small Business Finance, LLC ("Harvest") (Archway, Wells Fargo and Harvest, collectively, the "Lenders")—in the above-entitled jointly administered chapter 11 bankruptcy cases (the "Bankruptcy Cases") hereby stipulate as follows:

RECITALS

1. On March 18 and 19, 2024 the Debtors filed their jointly administered voluntary chapter 11 cases.
2. On June 7, 2024 the Debtors filed their *Motion By Affected Debtors For Entry Of An Order Authorizing Use Of Cash Collateral Pursuant To 11 U.S.C. § 363(c)(2)* ("Motion") (doc. no. 87).

1 3. On June 17, 2024, Archway filed an *Objection by Archway Real Estate Income Fund*
2 *I SPE I, LLC to Motion by Affected Debtors for Entry of an Order Authorizing Use of Cash*
3 *Collateral Pursuant to 11 U.S.C. § 363(c)(2)* (“Archway Objection”) (doc. no. 99).

4 4. On June 17, 2024, Wells Fargo filed Oppositions to Debtor’s Motion with respect to
5 the 2220 Bagley and 3538 Greenfield Properties. (See, Dkt. Nos. 100 (Bagley Property) and 101
6 (Greenfield Property)).

7 5. On June 18, 2024, Archway filed a *Status Report re Objection by Archway Real*
8 *Estate Income Fund I SPE I, LLC to Motion by Affected Debtors for Entry of an Order Authorizing*
9 *Use of Cash Collateral Pursuant to 11 U.S.C. § 363(c)(2)* (“Status Report”) (doc. no. 104). In the
10 Status Report, Archway consented to limited use of cash collateral on an interim basis under certain
11 conditions set forth therein, including that Archway’s rights and remedies with respect to the
12 Archway Objection be reserved and preserved and that it be granted certain adequate protection,
13 including a replacement lien and restrictions on the use of cash collateral, as set forth therein
14 (collectively, “Archway Rights and Protections”).

15 6. The initial hearing on the Motion was held on June 20, 2024 on shortened time.

16 7. On July 18, 2024, the Court entered its order authorizing the Debtors’ interim use of
17 cash collateral through July 23, 2024 (doc. no. 127) (the “Interim Cash Collateral Order”). The
18 Interim Cash Collateral Order sets forth, preserves, and reaffirms certain rights and adequate
19 protection measures in favor of the Lenders, including the Archway Rights and Protections
20 (collectively, the “Lender Rights and Protections”).

21 8. A continued hearing on interim use of cash collateral was scheduled for July 23,
22 2024.

23 9. On July 22, 2024, the Debtors and Lenders submitted a stipulation to continue the
24 hearing interim use of cash collateral and extend authorization for use of cash collateral, subject to
25 the Lender Rights and Protections, by approximately one month to August 27, 2024 (the
26 “Stipulation”) (doc.no. 131).

1 **SO STIPULATED.**

2 Dated: August 22, 2024

SAUL EWING LLP

3
4 By: /s/ Zev M. Shechtman
5 Zev Shechtman, Attorneys for Individual Debtors

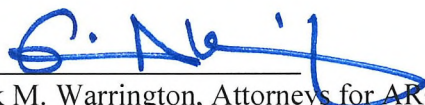
6
7 Dated: August 26, 2024

**WEINTRAUB ZOLKIN TALERICO & SELTH
LLP**

8
9 By: 
10 Derrick Talerico, Attorneys for Corporate Debtors

11
12 Dated: August 23, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.

13
14 By: 
15 Gerrick M. Warrington, Attorneys for ARCHWAY
16 REAL ESTATE INCOME FUND I REIT, LLC, fka
17 ARCHWAY REAL ESTATE INCOME FUND I SPE I,
18 LLC

19
20 Dated: August __, 2024

HEMAR, ROUSSO & HEALD, LLP

21
22 By: _____
23 Jacqueline L. James, Attorneys for HARVEST
24 SMALL BUSINESS FINANCE, LLC

25
26 Dated: August __, 2024

ALDRIDGE PITE, LLP

27
28 By: _____
Todd S. Garan, Attorneys for WELLS FARGO
BANK NATIONAL WEST

SO STIPULATED.

Dated: August 22, 2024

SAUL EWING LLP

By: _____
Zev Shechtman, Attorneys for Individual Debtors

Dated: August __, 2024

**WEINTRAUB ZOLKIN TALERICO & SELTH
LLP**

By: _____
Derrick Talerico, Attorneys for Corporate Debtors


Dated: August __, 2024

FRANDZEL ROBINS BLOOM & CSATO, L.C.

By: _____
Gerrick M. Warrington, Attorneys for ARCHWAY
REAL ESTATE INCOME FUND I REIT, LLC, fka
ARCHWAY REAL ESTATE INCOME FUND I SPE I,
LLC


Dated: August 26, 2024

HEMAR, ROUSSO & HEALD, LLP

By:  _____
Jacqueline L. James, Attorneys for HARVEST
SMALL BUSINESS FINANCE, LLC

Dated: August 23, 2024

ALDRIDGE PITE, LLP

By:  _____
Todd S. Garan, Attorneys for WELLS FARGO
BANK NATIONAL WEST

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding.
My business address is:

Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067

A true and correct copy of the document entitled: **STIPULATION TO FURTHER
CONTINUE HEARING ON MOTION TO AUTHORIZE USE OF CASH COLLATERAL
PURSUANT TO 11 U.S.C. § 363(C)(2)** will be served or was served (a) on the judge in
chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING
(NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served
by the court via NEF and hyperlink to the document. On **August 26, 2024**, I checked the
CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the
following persons are on the Electronic Mail Notice List to receive NEF transmission at the email
addresses stated below:

SEE ATTACHED

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date), I served the following persons and/or entities at the last known addresses in this
bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed
envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing
the judge here constitutes a declaration that mailing to the judge will be completed no later than 24
hours after the document is filed.

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE
TRANSMISSION OR EMAIL (state method for each person or entity served):**

Pursuant to
F.R.Civ.P. 5 and/or controlling LBR, on **August 26, 2024**, I served the following persons and/or
entities by personal delivery, overnight mail service, or (for those who consented in writing to
such service method), by facsimile transmission and/or email as follows. Listing the judge here
constitutes a declaration that personal delivery on, or overnight mail to, the judge will be
completed no later than 24 hours after the document is filed.

BY OVERNIGHT DELIVERY:

Hon. Vincent P. Zurzolo
U.S. Bankruptcy Court
Roybal Federal Building
255 E. Temple Street, **(BIN OUTSIDE SUITE 1360)**
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and
correct.

August 26, 2024
Date

Easter A. Santa Maria
Printed Name

Easter A. Santa Maria
Signature

SERVICE BY NEF:

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Jennifer C Wong on behalf of Interested Party Courtesy NEF

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